

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

LILIMAR VELEZ PUCHALES

DEBTOR

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CASE NO. 13-05077 MCF

CHAPTER 13

DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM TAX REFUND

TO THE HONORABLE COURT:

NOW COMES, **LILIMAR VELEZ PUCHALES**, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor's confirmed Plan dated June 20, 2013, provides that debtor's tax refunds will be paid into the Plan. See docket no. 2, 17.
2. The debtor has received her 2012 tax refund in the sum of 2,005.00. Attached is copy of check dated October 11, 2013 issued by Treasury Department of Puerto Rico.
3. The debtor respectfully submits to the Court that she needs to use these funds to pay for: materials and labor cost to repair roof-leak on debtor's residential property and mechanical repairs to debtor's motor vehicle. Attached is copy of house roof repair materials invoice/estimate and auto repairs estimate.
4. The debtor needs to use the funds from the 2012 "tax refund" to pay for these reasonable expenses. Furthermore, the debtor is living within a very "tight" budget which barely covers her living expenses and a Plan payment of \$150.00.
5. Based on the abovestated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for these expenses with her "tax refund".

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Debtor's Motion Requesting Order
Case no. 13-05077 MCF13

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2012 tax refund by the debtor to pay for the above stated expenses.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent via US Mail to Lilimar Velez Puchales, Estancias La Ceiba 525 Rafael Hernandez Street Juncos PR 00777.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 4th day of November, 2013.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

A black and white photograph of a cow and a calf standing together. The cow is on the left, facing left, and the calf is on the right, facing right. They are both looking towards the camera. The cow has a dark coat with white patches, and the calf is mostly white with some dark spots. They are standing on a light-colored, possibly sandy or dirt, ground. The background is dark and indistinct.

¡AL MEJOR PRECIO!

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☐ C.O.D.

FECHA

NOMBRE

DIRECCIÓN

CANTIDAD

DESCRIPCIÓN

PRECIO

TOTAL

2	1	pailas de Sabarek	198.00
2	2	pailas cemento hidraulico	76.00
5	3	pailas sellador Crossed 5.50	665.00
2	4	ganchos de Rolo	6.00
3	5	motas de Rolo	9.00
	6		
	7		\$ 954.00
	8		
	9		TAX 66.70
	10		
	11		\$ 1,020.70
	12		
	13		
	14		
	15		
	16		
	17		
	18		

11469

RECIBIDO POR:

Auto Master Express

P.O. Box 1751
Juncos, PR 00777
Tel. 787.734.5995 Fax 787.734.2124

Estimate

Date	Estimate #
10/24/2013	192

Name / Address
Lilimar Velez Urb. Estancias de la Ceiba 525 Calle Rafael Hernandez, Juncos, PR 00777

			Project
Description	Qty	Cost	Total
Platos	2	75.00	150.00T
Botellas delanteras	2	89.00	178.00T
Botellas traseras	2	69.00	138.00T
Alineamiento	1	55.00	55.00T
Labor: Reparación Tren delantero	1	275.00	275.00T
Reemplazar Botellas Traseras	1	125.00	125.00T
Impuestos de Ventas y Usos (7%)		7.00%	64.47
Total			\$985.47

Customer Signature



FECHA	NUMERO DE COMPROBANTE	DESCRIPCION/CONTRATO	FACTURA/OPE	IMPORTE DEL COMPROBANTE
11/10/13	000025	REINT 2012	----	\$****2,005.00

	DIA	MES	AÑO
17559549	11	10	13
NUMERO DE CHEQUE	FECHA EMISION		

ESTADO LIBRE ASOCIADO DE PUERTO RICO

RETENGA ESTE TALON
PARA SUS RECORDS.

Ver al dorso para detalles de los mecanismos de seguridad / See reverse side for complete security features

Modelo SC 784.3
31-ENERO-2006



REINT
2012

DIA	MES	AÑO
11	10	13
FECHA EMISION		

DIA	MES	AÑO
11	04	14
VENCE EN		

17559549

NUMERO DE CHEQUE

IMPORTE

\$*****2,005.00

DOS MIL CINCO DOLARES CON NO/100

LILIMAR VELEZ PUCHALES



Martha Santa Febrer

SECRETARIO DE HACIENDA

VELEZ PUCHALES, LILIMAR
ESTANCIAS DE LA CEIBA
525 RAFAEL HERNANDEZ STREET
JUNCOS, PR 00777

ROOMS TO GO
PO BOX 981439
EL PASO, TX 79998

R. Figueroa Carrasquillo
Law Office
PO Box 186
Caguas, PR 00726-0186

SALLIE MAE
PO BOX 9500
WILKES BARRE, PA 18773

AMERICAN EXPRESS
PO BOX 47455
JACKSONVILLE, FL 32247-7455

SEARS
PO BOX 6189
SIOUX FALLS, SD 57117-6189

BANCO POPULAR DE PR
PO BOX 70100
SAN JUAN, PR 00936-8100

T-MOBILE
PO BOX 660252
DALLAS, TX 75266-0252

BANCO SANTANDER
PO BOX 362589
SAN JUAN, PR 00936-2589

COSTCO
PO BOX 30253
SALT LAKE CITY, UT 84130

DORAL BANK
PO BOX 29426
RIO PIEDRAS, PR 00929

GEGRB/HOME DESIGN FURN
PO BOX 965036
ORLANDO, FL 32896

JC PENNEY
PO BOX 364788
SAN JUAN, PR 00936-4788

ORIENTAL BANK (BBVA)
PO BOX 191017
SAN JUAN, PR 00919-1017